

25 September 2008

Review Manager
(Norfolk & Suffolk Review)
The Boundary Committee for England
Trevelyan House
Great Peter Street
London
SW1P 2HW

Dear Sirs

BOUNDARY COMMITTEE'S DRAFT PROPOSALS FOR SUFFOLK

I write on behalf of the Stour and Orwell Society ("SOS"), a society dedicated to the preservation and enhancement of the environment of the Stour and Orwell Area of Outstanding Natural Beauty and the adjoining Special Project Area. This encompasses broadly the currently unspoilt areas of the Shotley Peninsula and the Stour and Orwell estuaries.

SOS has approximately 200 members and its patron is local resident and environmental campaigner, Griff Rhys Jones. The Boundary Committee's proposals were considered by SOS at its last committee meeting and this letter reflects the views expressed on that occasion.

1. CONSULTATION PERIOD

SOS is deeply concerned about the limited period of time for considering these proposals, straddling the summer holidays, especially in circumstances where the content of the proposals has come as a complete surprise to many of us.

Local government reorganisation typically only happens once in a generation and it is critically important that it is done properly, after a proper period of debate and reflection.

We understand that "Business Plans" for the various competing proposals were to be available only on 19th September (one week before the close of the consultation), although we received no notification of where they can be consulted and they are not in public libraries. In any event, one week for considering such material is completely inadequate. We would be grateful to receive your response on this matter.

2. THE PRINCIPLE

Once the principle of unitary government is accepted (and SOS understands that the principle is not being debated), then it is difficult to distinguish Suffolk from Norfolk, save that Suffolk is smaller.

The case said to be underpinning North Haven is essentially that it has the potential to develop a separate economic identity. However the Haven Ports grouping straddles the county boundary with Essex and does not function wholly or even primarily within Suffolk. The “Haven Ports” might, in theory, form the basis for a new authority straddling the old county boundaries, but this is not what is proposed.

However, and first, if there are economic gains associated with the development of Ipswich and Felixstowe, then it is difficult to see logically why these should not be shared with the rest of Suffolk. In our view, there is a very real risk that North Haven will be socially divisive, particularly for areas where rural poverty is pronounced, such as north east Suffolk and parts of mid-Suffolk.

Second, if the North Haven proposal has its foundations in the Haven Gateway Strategy, then it is bizarre that the boundary of the proposed North Haven area does not reflect the Directions of Strategic Growth for Ipswich which Haven Gateway are themselves promoting. This issue is particularly pronounced north of Ipswich (Westerfield, Witnesham etc) where a boundary tight up against the existing Ipswich boundary is proposed in the Boundary Committee’s draft report. This fundamentally conflicts with the Haven Gateway strategy.

Third, this boundary would, in any event, compromise the long held view that Ipswich could expand sustainably to the north, having regard to the areas served by the railway line.

These points all serve to emphasise SOS’s overarching view that it is better to leave Suffolk with a single unitary authority, allowing benefits and burdens to flow evenly across the county and not to impose artificial barriers by way of new local government boundaries.

3. COMMENTS ON “NORTH HAVEN” AS PRESENTLY PROPOSED

If, contrary to what we say above, one accepts the “Ipswich and Felixstowe” concept, then SOS must ask why it is necessary or sensible to bolt on the rural Shotley Peninsula. Our conclusion is that this has been done because it appears to be convenient to do so when looking at the area on a map. In fact, in terms of land use and function, there is no logic in bolting the Shotley Peninsula on to Ipswich and far less logic than there is in including areas to the north (see above) and west of Ipswich which have been excluded from “North Haven” as presently proposed.

The Shotley Peninsula is an extremely rural area with very high quality farm land, much of which is a designated Area of Outstanding Natural Beauty. SOS is dedicated to working for the preservation and enhancement of the environment of this area. Plainly, by placing it within the boundary of new and essentially urban area, you place this special environment at risk in a number of ways:

- i. The urban majority will always be able to outvote the rural minority on any issue, however sensitive;
- ii. In time, when this process is long forgotten, development pressures from the otherwise constrained urban area of Ipswich will inevitably be exerted on this rural and presently unspoilt area. Contrary to what is said at para. 6.14 of your draft report, there is no designated green belt around Ipswich and any conclusion which relies upon this is, regrettably, misconceived. This area with which SOS is concerned has been protected for many years by its inclusion within a predominantly rural authority (Babergh). The Committee's proposals will destroy this protection at a stroke and replace it with nothing.
- iii. In this context, the reference at para. 6.14 of the draft report to "planning developments on the Shotley Peninsula, which...have a stronger focus on Ipswich..." is misconceived. The only "planning development" on the Peninsula is Ganges, which is an historic developed site, the planning future of which is as yet undetermined and which is, in any event, proposed very largely as a retirement community. The road system on the Peninsula makes it completely unsuited to further development on any scale.

4. CONCLUSION

In summary, SOS supports the options discussed in the following order:

- i. a single unitary Suffolk;
- ii. "North Haven" with the Shotley Peninsula transferred to rural Suffolk;
- iii. "North Haven" with significantly increased boundaries to include the areas north and west of Ipswich where expansion is envisaged in the Haven Gateway Strategy and to give a better rural/urban balance.

We thank you in advance for considering our views and hope that you will find these representations helpful.

Yours faithfully

Rodney Chadburn

Honorary Secretary
Stour & Orwell Society